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To: [Kristine Koch/R10/USEPA/US@EPA](#); [Deb Yamamoto/R10/USEPA/US@EPA](#); [Dan Opalski/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Sean Sheldrake/R10/USEPA/US@EPA](#); [MCCLINCY Matt](#); [BAYUK Dana](#)
Cc: [PEDERSEN Dick](#); [DECONCINI Nina](#)
Subject: FW: Gasco Meeting with DEQ and NW Natural on 11/6
Date: 10/27/2008 05:00 PM
Attachments: [Proposed order of work for NW Natural.doc](#)

Kristine,

Thanks for sending your proposed agenda for the 11/6 DEQ/EPA morning meeting which will precede the DEQ/EPA/NWN 11/6 afternoon meeting. We have a lot to cover in the DEQ/EPA meeting, which I understand runs from 9:00-12:00. I agree that we should focus on the 2 topics you suggested. Unfortunately it appears DEQ & EPA are far apart on what each agency anticipates is needed at Gasco to achieve source control. We're surprised to read EPA believes an extremely expensive, fully penetrating, laterally extensive, vertical barrier wall running from US Moorings to Arkema is needed..., especially without the benefit of an EE/CA or FS. We do not support your vision of full-length, fully penetrating barrier wall..., particularly without an FS.

Right now, I think the most important thing DEQ needs to understand is whether EPA's *"Ideal integrated order of work"* is what EPA will require at Gasco or is simply what EPA thinks may be needed. DEQ & NWN are ready to move forward with a Vibration Study that will help design the proposed hanging wall/well source control removal action DEQ approved in concept in Spring '08. On the 1 hand, if EPA's position is that EPA will only accept a fully penetrating, full length wall..., then it appears the time & money NWN spends on the proposed hanging wall/well measure may be wasted. On the other hand, if EPA is only considers the fully penetrating, full length wall a possible ultimate outcome..., then we should move forward with the hanging wall/well measure as the 1st step in an adaptive management approach.

It's clear we'll need much more than 3 hours on the morning 11/6 to resolve our differences, define a path forward, & prepare for the DEQ/EPA/NWN afternoon mtg. With that said, I think it's important to look at what we need to accomplish in our 11/6 AM mtg so that we can meet with NWN in the afternoon. I think we should spend the 1st hour (& only the 1st hour) of our 11/6 AM mtg discussing..., as you said..., the overall schedule for work..., with the goal of reaching

agreement on Big Picture Cleanup (uplands & in-water) at Gasco. Realistically, since we're apparently so far apart..., I don't think we'll be able to do much more in that 1st hour than to frame the issues, clearly state our positions, clarify any possible misunderstanding, & develop a plan to resolve our differences.

In the 2nd & 3rd hour of our DEQ/EPA mtg, I think we need to clarify expected lines of communication between DEQ, EPA, & NWN..., & focus what direction we give to NWN in the afternoon. Right now, it appears:

1) DEQ wants NWN to implement their Vibration Study Analysis to help design the well/hanging wall source control measure (SCM) DEQ approved in concept in Spring 2008. We believed that while EPA had concerns about the adequacy of this SCM (as expressed in Deb's 6/25/08 letter to DEQ)..., EPA agreed that we should move forward with that SCM as the 1st step in an adaptive management approach to source control (as I thought I heard from Kristine in our 8/19/08 conference call). Based on EPA's "*Ideal integrated order of work*" (attached to Kristine's 8/22 e-mail), I was apparently wrong..., & DEQ & EPA do not agree on what's needed.

2) EPA apparently wants NWN to abandon their proposed well/hanging-wall SCM that DEQ approved in concept in Spring 2008, & start gathering data to design & construct a fully penetrating (keyed to bedrock at approximately 200' bgs), laterally extensive (running from US Moorings to the RR bridge, approximately 4,500 linear feet) subsurface barrier wall. **Is this EPA's position?**

It would be ideal if DEQ & EPA could reach agreement on what & how much work is necessary to achieve source control at Gasco in our morning meeting & provide shared direction to NWN..., but based on your "*Ideal integrated order of work*"..., I'm not sure we'll be able to. If DEQ & EPA can't agree how to direct NWN in source control, then we may go into the DEQ/EPA/NWN 11/6 afternoon meeting saying..., this is what DEQ wants NWN to do, but this is what EPA wants NWN to do. Not an ideal situation at all..., but a situation that may actually help source control move forward by allowing all stakeholders to hear the status, issues, & positions all at the same time...; & then hopefully move away from positional stances & into interest-based, positive outcomes.

So, let me re-cap & suggest the next steps:

1) EPA should advise DEQ whether EPA's "*Ideal integrated order of work*" is what EPA will require at Gasco or is simply what EPA thinks may be needed. Furthermore, EPA should advise DEQ whether you believe NWN should abandon the hanging wall/well SCM in favor of a full-length, fully penetrating wall?

2) DEQ & EPA should both flesh-out Kristine's suggested DEQ/EPA morning mtg agenda with discussion topics & desired outcomes. Dana Bayuk is all ready working on discussion topics for our 11/6 AM mtg.

3) DEQ & EPA should plan to meet with NWN the afternoon of 11/6 regardless of the outcome of our morning mtg.

Of course, I'm very interested to hear your thoughts regarding this e-mail & moving the Gasco project forward.

Jim Anderson

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-----Original Message-----

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Sent: Wednesday, October 22, 2008 1:27 PM

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Subject: Gasco Meeting with DEQ and NW Natural on 11/6

Jim, EPA would like to propose that we discuss the following agenda items in the morning session with DEQ.

1) Discuss overall schedule of work (see attached)

(See attached file: Proposed order of work for NW Natural.doc)

Goal: Reach agreement on Big Picture Cleanup (Uplands and In-water)

at the Gasco site.

2) Discuss details of upland source control and issues (near-term vs.

future)

Discuss critical items that need to occur and timing (near-term vs.

future)

Discuss river bank control (near-term) vs. source control (long-term)

Discuss details of river bank control and issues with current design)

Goal: Reach agreement on how much work is necessary to achieve source control.

EPA would like to focus the discuss with NW Natural to #2, if possible.

Thank you,

Kristine Koch

Remedial Project Manager

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order of work for NW Natural.doc>>